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December 11, 2024

VIA ECF AND ELECTRONIC MAIL

Hon. John P. Cronan
United States District Judge
Southern District of New York
500 Pearl Street, Courtroom 12D
New York, New York 10007
CronanNYSDChambers@nysd.uscourts.gov

Re: *Goncalves Agra v. Massachusetts Institute of Technology, et al*; Case No. 1:23-cv-10305

Dear Judge Cronan:

We represent Defendant Frederico Azevedo (“Dr. Azevedo”) in the above-referenced matter. We write regarding Your Honor’s December 4, 2024 Order requiring the Parties to submit either a stipulation of dismissal or a status letter by December 11, 2024.

On December 6, 2024, Plaintiff Marciniak sent an email, not through her counsel, setting forth that she had discharged her counsel and was seeking to represent herself. Plaintiff Marciniak also provided a draft stipulation of dismissal. While at the conference, it was discussed that the stipulation of dismissal would be with prejudice, the draft stipulation of dismissal provided by Plaintiff Marciniak dismissed some of the claims against Dr. Azevedo with prejudice and some without prejudice.

On that same day, counsel for Plaintiff Marciniak filed a letter motion to withdraw as counsel from the case. As this motion has not yet been decided, Plaintiff is still technically represented by counsel and we do not believe we are able to communicate directly with Plaintiff Marciniak regarding the stipulation of dismissal until this motion has been decided.

Dr. Azevedo respectfully requests additional time for the Parties to file a stipulation of dismissal with prejudice following the decision on Plaintiff’s counsel’s motion to withdraw as counsel.

Thank you for your consideration.

Very truly yours,

BOND, SCHOENECK & KING, PLLC

/s/ Mallory A. Campbell

Mallory A. Campbell

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cc: Via ECF
All counsel of record